

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

CR. NO. 04-CR-10336-NMG

SANTIAGO ARROYO

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Defendant Santiago Arroyo, by his attorney, moves that this Court modify his conditions of pretrial release to permit him reside with his wife at: 932 Albany Street, 2d Floor, Schenectady, NY 12307.

Defendant's conditions of release require him to reside at Coolidge House. Defendant has been informed that due to budget constraints, the Pretrial Services Office must cease its contract for payment to Coolidge House at the end of this month. Defendant has informed Pretrial Services Officer Picozzi that his residence of choice is with his fiancé.

The pretrial services officer has informed undersigned counsel that Mr. Arroyo has been fully compliant with his conditions of pretrial release and if this motion is allowed, the pretrial services office will seek courtesy supervision in New York; further, that defendant's travel be restricted to New York other than for court appearances and meetings with counsel at his office in Boston.

SANTIAGO ARROYO

By his attorney,

/s/ Elliot M. Weinstein  
Elliot M. Weinstein  
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Boston, MA 02110  
617-367-9334

February 2, 2006